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Attorneys for Defendants
TATA AMERICA INTERNATIONAL
CORPORATION, TATA CONSULTANCY
SERVICES, LTD. and TATA SONS, LTD.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GOPI VEDACHALAM and KANGANA
BERI, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

TATA AMERICA INTERNATIONAL
CORPORATION, a New York
corporation; TATA CONSULTANCY
SERVICES, LTD., an Indian corporation;
and TATA SONS, LTD., an Indian
corporation,

Defendants.

Case No. CV 0963 (VRW)

**STIPULATION AND ORDER FOR
CONTINUANCE OF INITIAL CASE
MANAGEMENT CONFERENCE AND
FILING OF JOINT CASE
MANAGEMENT STATEMENT**

[N.D. Local Rules 6-2 and 7-12]

[Declaration of Michelle M. La Mar filed
concurrently herewith]

Pursuant to this Court's Civil Local Rules 6-2 and 7-12, plaintiffs Gopi Vedachalam and Kangana Beri ("Plaintiffs"), and defendants Tata America International Corporation, Tata Consultancy Services, Ltd. and Tata Sons, Ltd. ("Defendants"), (collectively, the "Parties") by and amongst themselves, hereby stipulate as follows:

1. On March 13, 2007, in conjunction with the Court's ruling on Defendants' Motion to Compel Arbitration, the Court set the Case Management Conference ("CMC") in this matter for March 27, 2007 and ordered the Parties' Joint Case Management Statement to be filed on March 20, 2007.

2. Due to a pre-existing scheduling conflict, Plaintiffs' counsel is unavailable for the CMC date currently set by this Court.

3. Accordingly, the Parties agree to adjourn the date for the CMC to April 3, 2007 or to the Court's next available CMC date.

4. The Parties further agree to extend the date for filing the Joint Case Management Statement until March 27, 2007 or seven days before the rescheduled CMC should a date other than April 3, 2007 be set by this Court.

5. Nothing contained in this Stipulation is intended to waive prejudice or alter Defendants' right to seek an additional adjournment of the CMC based upon the filing of a

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1 Motion to Dismiss or on other grounds.

2 Dated: March 16, 2007

LOEB & LOEB LLP

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By: /s/ Michelle M. La Mar

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Michelle M. La Mar
Attorneys for all Defendants

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8 Dated: March 16, 2007

KELLEY DRYE & WARREN LLP

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By: /s/ Kevin J. Smith

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Kevin J. Smith
Attorneys for all Defendants

12

13 Dated: March 16, 2007

LEIFF, CABRASER, HEIMANN &
BERNSTEIN, LLP

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By: /s/ Kelly M. Dermody

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Kelly M. Dermody
Attorneys for all Plaintiffs

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19

20 Dated: March 16, 2007

RUKIN HYLAND DORIA &
TINDALL LLP

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By: /s/ Steven M. Tindall

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Steven M. Tindall
Attorneys for all Plaintiffs

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

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27 Dated: March 19, 2007



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Judge, United States District Court

Signature Attestation:

I, Michelle M. La Mar, hereby attest that I have on file all holograph signatures for any signatures indicated by a "conformed" signature (/s/) within this efiled document.

/s/ Michelle M. La Mar
Michelle M. La Mar